

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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RANDY SINGLETON,

Plaintiff,

**PLAINTIFF'S PROPOSED  
VOIR DIRE QUESTIONS**

-against-

15 CV 1011 (ALC)

POLICE OFFICER CHARNE JIMINEZ et als,

Defendants.

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Pursuant to the Court's individual practices, Plaintiff Randy Singleton respectfully submits the following list of proposed questions for prospective jurors.

1. Do you have any opinions concerning the New York City Police Department?
  - (a) If a civilian and a police officer give conflicting testimony about the same incident, would you be inclined to believe the police officer over the civilian and why?
  - (b) How reliable do you think police officer testimony is?
  - (c) Anyone here think that police officers are more reliable, more credible than other witnesses?
  - (d) Do you agree that some police officers are credible and some are not?
  - (e) Anyone here think that all police officers are gentlemen and can do no wrong?
  - (f) Do you agree that some police officers are gentlemen and some are not?
  - (g) That they are human beings capable of the good as well as deplorable behavior?
  - (h) Can you be fair to both sides?
2. Anyone here have a negative opinion of individuals who sue for money damages?

3. Anyone here have an opinion about individuals who sue the police in particular?
  - (a) What is that opinion?
  - (b) If someone were to harm you in some way and filing a lawsuit presented an opportunity to, in some measure, remedy that harm, would you file a lawsuit?
  - (c) Has anyone here ever been sued?
4. This is a case in which a gentleman sued New York City police officers alleging civil rights violations. Would you have any difficulty being completely fair and impartial in such a case? If so, please explain in the absence of the other members of the panel.
5. Have you or has any member of your immediate family, household ever held any job in (a) a law enforcement agency, (b) any government agency, (d) the state or local police, (d) the FBI, (e) any prosecutor's office, (f) probation or parole agency or (g) a private detective or security guard agency?
  - (a) If so, have any of them been sued for acts allegedly committed on the job?
  - (b) If, so will that interfere with your ability to be fair to plaintiff in this case?
  - (c) Will your relationship with that individual interfere with your ability to be fair to plaintiff?
6. Have any of your neighbors, friends or relatives ever held a job in (a) a law enforcement agency, (b) any government agency, (d) the state or local police, (d) the FBI, (e) any prosecutor's office, (f) probation or parole agency or (g) a private detective or security guard agency?
  - (a) If so, have any of them been sued for acts allegedly committed on the job?
  - (b) If, so will that interfere with your ability to be fair to plaintiff in this case?
  - (c) Will your relationship with that individual interfere with your ability to be fair to plaintiff?
7. Do you interact with members of law enforcement at work?
  - (a) If so, what is the extent of that interaction?
  - (b) Will it interfere with your ability to be fair to plaintiff?

8. Have you or a family member ever called the police for help?
  - (a) What was the reason?
  - (b) What was the result of the call?
  - (c) What was your opinion as to how the police conducted themselves?
9. How will you go about assessing the credibility of the witnesses who will testify before you?
  - (a) How important do you think your common sense when making that kind of assessment
  - (b) Can you think of some instances in your life where you have had to assess credibility, to decide whether a particular person was telling you the truth or not?
  - (c) What if the story doesn't make sense, what bearing will that have on your assessment of a witness's credibility?
  - (d) What if the physical evidence in the case doesn't match or square with the story, what effect will that have on your assessment of a witness's credibility?
  - (e) Do you think that if a person changes his story that might have some bearing on his or her credibility?
  - (f) Do you think that if a person had reasons to make up a story that in and of itself might affect his credibility?
10. Do you believe that you would have a difficult time, for whatever reason, putting a dollar value on Mr. Singleon's damages, including injuries for lost liberty even if the evidence and the law supports that he be compensated for those items?
11. Would you have any trouble awarding damages not just to compensate a person for injuries, but also to punish a police officer who abused his authority?
12. Have you or a member of your family or household, or a close friend, ever had positive interactions with the police?
  - (a) Please describe what they were.
  - (b) Will those positive interactions with police officer who were clearly gentlemen make it more difficult for you to believe the plaintiff's testimony?
13. Have you ever given testimony at a trial or other court proceeding?

DATED: November 14, 2017  
New York, New York

/s  
Robert Marinelli, Esq.

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